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The following comments are submitted regarding RM-1066 and the Rural Translator Service Proposal.

The NTA has put forth a proposal based on providing over the air TV service to rural areas that are not being served. The basis for providing service to non-served areas, as defined by the RTS proposal, has merit. Whether the reasons for the lack of service being provided to rural US households over the years is accurate or not is not really the question but how to address those needs is. Both cable and DBS do not appear to be attractive because of the cost of implementing each of the delivery methods. I believe the definition of an unserved area is a good one based on the information presented by NTA and commonly available program sources in even mid-sized communities. As evidenced by events such as 9/11, the households of the US still rely on over the air broadcast to receive news and important information with regard to issues of significant importance. If possible, rural America should receive the same sort of information available to those people located in urban areas without adding the burden of additional costs.

The definition of an "unserved area" seems to be based on technically sound principles and based on comparable urban service. The FCC has recognized that the Longley Rice model of propagation is a better model than using the previous 50/50 contour model that does not take into account the effects of terrain. Therefore, using that model for determination of service if the contour method predicts service but due to experience, it is known that the primary station cannot be received, has merit.

I support the conclusion that the Decisionmark survey indicates in that the newer networks have not had the time or opportunity, whatever way one wants to look at it, to establish broader coverage because of the change in the FCC policy regarding filing windows and associated application speculation for translators and low power TV stations. Translators are the main avenue for extension of a network's ability for its affiliate stations to broaden their service. The FCC's method for translator applications using windows for filing with long stretches of time between windows has impaired the ability to extend the service areas for the affiliate stations. I don't believe the desired result of the windows has been achieved when there are 5-10 applications for each real station or area served and resulting in further delays of serving the public interest with broadcast media. I support the proposal for a rolling one day window cutoff for translator applications that fall within the designated translator no service scenario described in the NTA proposals. However, I believe there will still be mutually exclusive applications that will require some means to resolve. These mutually exclusive applications could also include situations for non-commercial and commercial stations. For commercial stations, I would propose a 30 day settlement period and an auction within the next 30 days if there is no way for a settlement to be reached. Non-commercial translators could either use the point system to determine the winner, or allow one non-commercial translator to cover an unserved area for every 3 commercial translators. With regard to the processing of applications, I believe the FCC could have a checklist similar to the checklist used for DTV applications. However, it is my opinion that the tech box portion of the FCC 346 form will still need to be filed and a suitable interference analysis required if overlap is indicated. I also support the construction permit period of six months. Translators are usually easy to install and become operational unless weather does not permit the installation of the equipment. In

which case, a maximum of one extension could be granted on the CP. I would recommend that the translator power limits be established on an ERP basis, not transmitter power. The power levels recommended by the NTA seem appropriate to cover the areas that typically will be needed. I also support the programming requirements outlined in the NTA proposal. If the translator is repeating a digital primary station, once digital transmission requirements for translators and low power TV stations have been defined, new translators should be permitted to repeat whatever programming is provided by the primary station assuming the transmission parameters are met. If a translator is converted from analog to digital service, I would propose the ERP be reduced to 10 percent of the analog value and a filing with the FCC would be required indicating how compliance with the DTV transmission standards will be met. If a translator is moved, I would propose that all of the initial coverage area overlap be maintained in that move, unless by methods such as Longley-Rice it can be shown that there is no population in the area that would be removed from coverage. The maintenance of coverage would deter frequency speculators from trying to get around the intent of the rules.

The digital rollout will be accelerated by the judicious choice of translators and their locations. It is my belief that a form of the NTA proposal will serve that goal. In addition, analog service is needed now in areas that cannot receive a diversity of programming that is enjoyed by many parts of the US.

Respectfully submitted,

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President